

**REMARKS****Introduction**

Claims 30-63 are pending in this application. Claims 1-29 have been cancelled, without disclaimer or prejudice. By this Response, claims 30, 45, 50, 51, 59, 60, 61, and 62 have been amended. All amendments are supported by the specification as originally filed. No new matter has been introduced. Reconsideration of this application for allowance of all pending claims is hereby respectfully requested in view of the amendments to the claims and the following remarks.

**Claim Rejection – 35 U.S.C. § 103**

Claims 30-36, 44-53, 56, and 58 have been rejected under 35 U.S.C. §103 (a) as being unpatentable over Clark (U.S. Patent No. 6,345,243) in view of Shreve (U.S. Publication No. 2003/0154071). The Applicants respectfully traverse the rejection.

By this Response, independent claims 30, 45, 50, and 51 have been amended. The amended claims recite “determining a portion of the first content that is not yet translated”, “scheduling at least one URL for translation” and such URLs are selected “based on the portion of the content that is not yet translated”. As recited in those claims, the translation of the selected URL is done by a human translator. Note here the content in the first language or content to be translated is from a website, retrieved either by crawling or by intercepting, and then a portion of such retrieved content that is not yet translated is determined and used to decide how much of the retrieved content is to be translated by a human translator. These features are not found in Clark and Shreve, either alone or in combination. Although Shreve crawls a web site, the content obtained via crawling is NOT the content to be translated, as recited in claims 30, 45, 50, and 51. Shreve teaches to crawl to obtain content that is then used to merely augment a

memory used to maximize machine translation rather than schedule to translate the content, as claimed in the amended independent claims.

It is well settled that to establish a prima facie case of obviousness against a claim, the cited prior references, either alone or in combination, must teach each and every feature recited in the claim. Since claims 30, 45, 50, and 51 recite features that are not taught by either Clark or Shreve, no prima facie case of obviousness has been established. Thus, claims 30, 45, 50, and 51 are not obvious over Clark in view of Shreve. Therefore, the Applicants respectfully request that rejection of claims 30, 45, 50, and 51 under 35 U.S.C. §103 (a) be withdrawn.

Claims 31-36, 44, 46-49, 52-53, 56, and 58 depend from claims 30, 45, 50, and 51, respectively. Thus, claims 31-36, 44, 46-49, 52-53, 56, and 58 are not obvious and patentable for at least the same reasons as discussed with respect to claims 30, 45, 50, and 51 and for the additional features recited therein. Therefore, the Applicants respectfully request that rejection of claims 31-36, 44, 46-49, 52-53, 56, and 58 under 35 U.S.C. §103 (a) be withdrawn.

Claims 37-43 have been rejected under 35 U.S.C. §103 (a) as being unpatentable over Clark in view of Shreve, and further in view of Cartus (U.S. Patent No. 6,993,473). The Applicants respectfully traverse the rejection.

By this Response, independent claim 30 has been amended. As discussed above, the amended claim 30 recites features that are not found in Clark and Shreve. The Applicants respectfully point out that Cartus does not teach those recited features either. Therefore, either alone or in combination, none of the cited prior art references teaches all the features recited in claim 30. It is well settled that to establish a prima facie case of obviousness against a claim, the cited prior references, either alone or in combination, must teach each and every feature recited in the claim. Since claim 30 teaches features that are not taught by Clark, Shreve, or Cartus, no

prima facie case of obviousness has been established. Thus, claim 30 is not obvious over Clark in view of Shreve and further in view of Cartus. Therefore, the Applicants respectfully request that rejection of claim 30 under 35 U.S.C. §103 (a) be withdrawn.

Claims 37-43 depend from claim 30. Thus, claims 31-43 are not obvious and patentable for at least the same reasons as discussed with respect to claim 30 and for the additional features recited therein. Therefore, the Applicants respectfully request that rejection of claims 31-43 under 35 U.S.C. §103 (a) be withdrawn.

Claims 54 and 55 have been rejected under 35 U.S.C. §103 (a) as being unpatentable over Clark in view of Shreve, and further in view of Hargrave et al. (U.S. Patent No. 5,724,593). The Applicants respectfully traverse the rejection.

By this Response, independent claim 51 has been amended. As discussed above, the amended claim 51 recites features that are not found in Clark and Shreve. The Applicants respectfully point out that Hargrave et al does not teach those recited features either. Therefore, either alone or in combination, none of the cited prior art references teaches all the features recited in claim 51. It is well settled that to establish a prima facie case of obviousness against a claim, the cited prior references, either alone or in combination, must teach each and every feature recited in the claim. Since claim 51 teaches features that are not taught by Clark, Shreve, or Hargrave et al, no prima facie case of obviousness has been established. Thus, claim 51 is not obvious over Clark in view of Shreve and further in view of Hargrave. Therefore, the Applicants respectfully request that rejection of claim 51 under 35 U.S.C. §103 (a) be withdrawn.

Claims 54-55 depend from claim 51. Thus, claims 54-55 are not obvious and patentable for at least the same reasons as discussed with respect to claim 51 and for the additional features

recited therein. Therefore, the Applicants respectfully request that rejection of claims 54-55 under 35 U.S.C. §103 (a) be withdrawn.

Claim 57 has been rejected under 35 U.S.C. §103 (a) as being unpatentable over Clark in view of Shreve, and further in view of Applicant's Admitted Prior Art (AAPA). The Applicants respectfully traverse the rejection.

By this Response, independent claim 51 has been amended. The amended claim recites features that are not found in Clark, Shreve, and AAPA. As discussed above, the amended claim 51 recites features that are not found in Clark and Shreve. The Applicants respectfully point out that AAPA does not teach those recited features either. Therefore, either alone or in combination, none of the cited prior art references teaches all the features recited in claim 51. That is, claim 51 teaches features that are not taught by Clark, Shreve, or AAPA and no prima facie case of obviousness has been established. Thus, claim 51 is not obvious over Clark in view of Shreve and further in view of AAPA. Therefore, the Applicants respectfully request that rejection of claim 51 under 35 U.S.C. §103 (a) over Clark in view of Shreve, and further in view of Applicant's Admitted Prior Art (AAPA) be withdrawn.

Claim 57 depends from claim 51. Thus, claim 57 is not obvious and patentable for at least the same reasons as discussed with respect to claim 51 and for the additional features recited therein. Therefore, the Applicants respectfully request that rejection of claim 57 under 35 U.S.C. §103 (a) over Clark in view of Shreve, and further in view of Applicant's Admitted Prior Art (AAPA) be withdrawn.

Claims 59-63 have been rejected under 35 U.S.C. §103 (a) as being unpatentable over Clark in view of Flanagan et al. (U.S. Patent No. 6,993,471). The Applicants respectfully traverse the rejection.

By this Response, independent claim 59-62 have been amended. The Applicants respectfully point out that neither Clark nor Flanagan et al. teaches features recited in claims 59-62. Therefore, either alone or in combination, none of the cited prior art references teaches all the features recited in claims 59-62. That is, no prima facie case of obviousness has been established. Thus, claim 59-62 are not obvious over Clark in view of Flanagan et al. Therefore, the Applicants respectfully request that rejection of claims 59-62 under 35 U.S.C. §103 (a) over Clark in view of Flanagan et al. be withdrawn.

Claim 63 depends from claims 59-62. Thus, claim 63 is not obvious and patentable for at least the same reasons as discussed with respect to claims 59-62 and for the additional features recited therein. Therefore, the Applicants respectfully request that rejection of claim 63 under 35 U.S.C. §103 (a) over Clark in view of Flanagan et al. be withdrawn.

### **Conclusion**

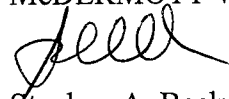
Having fully responded to all matters raised in the Office Action, Applicants submit that all claims are in condition for allowance, an indication for which is respectfully solicited. If there are any outstanding issues that might be resolved by an interview or an Examiner's amendment, the Examiner is requested to call Applicants' attorney at the telephone number shown below.

10/784,726

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

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